

**Iowa AFCARS
Assessment Review
Report**

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and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

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Executive Summary

From May 3 - 7, 2004 staff of the Children's Bureau, Administration for Children and Families (ACF) Region VII, and the Office of Information Services (OIS) conducted an assessment review of Iowa's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS data used for the review was from the report period April 1, 2003 through September 30, 2003 (2003B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" Matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B).

Between the time of the on-site review and the issuance of this report, the State's information systems staff made some corrections to the program code that maps and extracts the AFCARS data (revised version dated June 29, 2004). This report, the element findings, and the AFCARS Improvement Plan reflect those changes. As a result, some of the initial rating factors were updated to reflect the work completed by the State. Other changes in the rating factors reflect findings from further analysis of the case file review findings and other issues identified by both the State and Federal staff during post site-visit analysis. The final rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	3

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	16 ((24%))	10 (27%)	26 (25%)
3	19 (29%)	14 (38%)	33 (32%)
2	31 (47%)	13 (35%)	44 (43%)
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Outlined below is an overview of the results of the AFCARS Assessment Review based on the on-site and post-site visit analyses.

- General Requirements – Reporting population and technical requirements

The State is in full compliance with the adoption population requirements. In regard to the foster care population, the State does not include children in the agency's responsibility for care, placement and supervision that are placed with relatives in the foster care reporting population. This finding was identified during the State's Child and Family Services Review (CFSR) and the State was in the process of making corrections at the time of the on-site AAR. The State provided ACF with a copy of the draft changes for review and comment. ACF reviewed the draft changes and provided feedback to the State. The State implemented the changes on July 1, 2004. The State staff needs to send the revised extraction code to ACF as part of the AFCARS improvement phase.

In regard to the technical requirements, the State's program code does not extract the AFCARS foster care file based on a transaction date associated with either the date of the current removal from home or a discharge from foster care. This was resulting in fluctuations in the number of children being reported in AFCARS each report period. The State staff corrected the program code. ACF will monitor the submissions of data for two to three report periods to check for any fluctuations in the data.

- Significant Data Element Findings

Of the foster care elements that need changes in the program code or in the way the screen is designed to collect the data, 15 are related to the circumstances associated with removal. The State systems staff has completed some of the required changes, the remaining changes relate to modifying the program code to redirect where the data are extracted from and to "freeze" the data. Currently, the "circumstances associated with removal" are extracted from three different screens and the data can be updated at any time after the child is in foster care. The data should reflect the circumstances known to the case worker that contributed to the reason the child was removed from his/her home. Once the State completes the system changes supervisors should monitor the data to ensure workers are selecting all of the applicable circumstances.

The State's information system, Family and Children's Services (FACS), does not have the question "has this child been diagnosed with disabilities" on its data entry screens. There is a screen with a field for the worker to indicate with an "X" whether any of the listed categories of diagnosed disabilities apply. The response to the question on diagnosed disabilities is derived from these fields. So, if a disability is checked, the response to the question is "yes." Otherwise, the response is coded as "no," thereby creating a false "no" in the reported data. This method makes it hard to ascertain if the worker failed to enter the data or, alternatively, if the child had been seen by a physician and did not have any disabilities. The frequencies for this element appeared low to the State staff and indicate that the children in foster care have no medical or emotional problems.

There is a problem with how the program code determines the number of previous removals, the date of discharge from a prior removal episode, and the discharge reason for the current removal episode. Currently, the program code assesses a limited number of discharge reasons when it calculates the number of removals and the discharge date of the prior removal episode. The

State is also incorrectly mapping some of its discharge reasons to AFCARS. The State has corrected most of the mapping errors for the reason for discharge from the current removal episode. Also, the errors in these elements are related to the way the State was treating records of children placed with relatives. Once these changes have been fully implemented the data should better reflect what is occurring in Iowa's foster care system.

In the adoption file, the State is to report on the relationship of the child to the people that adopted him or her. AFCARS allows for the reporting of more than one relationship. The State is currently only extracting one type of relationship. This is resulting in an under-representation of the number of relatives and foster parents that are adopting children in Iowa.

Lastly, there are errors in the way the State reports who placed the child for adoption. Currently, the program code only extracts the response "public agency." This is incorrect because the State also is involved in non-State agency adoptions. The State enters into adoption agreements with families adopting children from private agencies and the child was determined to be special needs. These records should indicate "placed by private agency" in the AFCARS report.

The State needs to assess the on-going quality of the data. Several items were given the rating of "3" because of under-reporting of information and will necessitate additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider reviewing the data in the file at the time of a periodic review to ensure it is accurate and up-to-date. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data, and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a "2" to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a "3" will be assigned to the requirement. A rating factor of "4" (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be assigned. If it appears the problem is due to data entry, then a "3" will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State's AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review was from the report period April 1, 2003 through September 30, 2003 (2003B).

Overall, the State's information system design meets the AFCARS reporting requirements.¹ While there were several elements rated a "2" due to needed changes in the extraction of the data, many of these elements are part of the same "group" and the corrections will address all elements in each group. For instance, of the 103 AFCARS data elements there are 15 elements regarding "circumstances associated with removal" and ten elements associated with disabilities. Also, there are several areas where the State will need to focus on the quality of the data, for elements rated both a "2" and a "3."

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, team member notes, and corrections to the program code submitted by the State are assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

General Requirements

Population Standards

The State is in full compliance with the adoption population requirements. In regard to the foster care population, the State is not including the complete foster care population required under AFCARS. The standards for the AFCARS foster care population require that the State include all children in foster care for whom the agency has responsibility for placement, care, or supervision (45 CFR 1355.40(a)(2)). The State does not include in the foster care reporting population children placed with relatives. This was identified during the State's Child and Family Services Review (CFSR). The State was in the process of making corrections at the time

¹ This does not mean that the State's system is in full compliance with the Statewide Automated Child Welfare Information System (SACWIS) requirements.

of the on-site AAR. The State provided ACF with a copy of the draft changes for review and comment. ACF reviewed the draft changes and provided feedback to the State. The State implemented the changes on July 1, 2004. The State staff needs to send the revised extraction code to ACF as part of the AFCARS improvement phase.

There was another error in the foster care reporting population related to the reporting of children placed for adoption through a private agency. These are children that are determined to have special needs and the State is paying a subsidy payment to the family prior to the finalization of adoption. These children are not in the agency's responsibility for placement, care or supervision and therefore, should not be included in the foster care file. They are only to be reported in the adoption file. A relatively small number of cases are involved, which will have a minimal impact on the total number of children reported in the foster care file.

Technical Requirements

The State was not using the transaction dates associated with the date of removal and the date of discharge to extract the data file. This resulted in fluctuations in the number of children being reported in AFCARS each report period. The State staff corrected the program code, which is reflected in the June 25, 2004 revisions. ACF will monitor the submission of data for two to three report periods to check for any fluctuations in the data.

Data Elements

- Information on Children Diagnosed with Disabilities (foster care elements #10 - 15; adoption elements #11 - 15, if the primary basis for special needs is a medical/emotional condition)

The State staff indicated that this information is underreported for the foster care file. For the report period under review, the number of responses for "yes" were 2,880 (35%), 5,411 (65%) for "no," and zero for "not yet determined." In the foster care file AFCARS contains the question "Has the child been clinically diagnosed as having a disability(ies)?" The State's information system, Family and Children's Services (FACS), does not have this question. Instead, there is a screen with a field for the worker to indicate with an "X" whether any of the listed categories of diagnosed disabilities apply. The response to the question on diagnosed disabilities is derived from these fields. So, if a disability is checked, the response to the question is "yes." Otherwise, the response is coded as "no," possibly creating a false "no" in the reported data. A blank in any of the fields could mean the child has not been seen by a physician, that the worker has not received the doctor's report, or the child had been seen by a doctor and has no medical needs. The responses in AFCARS have specific definitions:

"Yes" indicates that a qualified professional has clinically diagnosed the child as having at least one of the disabilities listed below.

"No" indicates that a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities.

“Not Yet Determined” indicates that a clinical assessment of the child by a qualified professional has not been conducted.

The State staff did an extensive amount of work mapping the International Classification of Diseases (ICD) codes to AFCARS. However, many of these codes are not appropriate for AFCARS purposes. The State submitted a revised listing of the codes that are mapped to the AFCARS category “emotionally disturbed.” The Children’s Bureau reviewed this document and provided comments to the State.

- Total number of removals from home and the date of discharge from a prior removal episode (foster care elements #19 and 20)

There is a problem with how the program code determines the number of previous removals, the date of discharge from a prior removal episode, and the discharge reason for the current removal episode. Currently, the program code assesses a limited number of discharge reasons when it calculates the number of removals and the discharge date of the prior removal episode. It checks for a “placement exit date” with an exit reason of “return home,” “transfer custody to other parent,” or “placement with suitable person.” The State is also incorrectly mapping some of its discharge reasons to AFCARS. The State has corrected most of the mapping errors for the reasons for discharge from the current removal episode. Also, some of the errors in these elements are related to the way the State was treating records of children placed with relatives. Once these changes have been fully implemented the data should better reflect what is occurring in Iowa’s foster care system.

- Placement Information (foster care elements #23 and 41).

There were several issues relating to the collection and reporting of placement information. As noted previously in the population section, the State does not report non-paid relative placements. As of July 1, 2004, the State will implement a new “out of home placement” screen. This will capture information on children placed with relatives. The State has provided ACF with a copy of the planned screen.

The State still needs to update the program code to ensure that the “date of current placement” reflects the date the child ran away or was placed in his/her own home while still in the agency’s responsibility for care, placement or supervision (placement setting “trial home visit”). Also, since the program code does not check the information for the foster care provider, new dates of placement are inappropriately reported when there is a change in the status of a provider (i.e., if a provider becomes a pre-adoptive home). Also, the placement count should not include a return to the same placement setting from a “runaway,” “trial home visit,” or “acute stay hospitalization.”

The State is mapping all shelter care placements to “group home,” regardless of the size of the facility. Some of these facilities may house 12 children or more. Any facility with more than 12 children must be mapped to “institution.”

- Circumstances associated with removal (foster care elements #26 – 40)

The State systems staff has completed some of the required changes needed for these elements. The remaining changes relate to modifications to the program code to redirect where it extracts the data and to “freeze” the data at the time it was entered, or within a reasonable timeframe afterwards. Currently, the “circumstances associated with removal” are extracted from three different screens and the data can be updated at any time after the child is in foster care. The data should reflect the circumstances known to the case worker that contributed to the reason the child was removed from his/her home. Once the State completes the system changes, supervisors should monitor the data to ensure workers are selecting all of the applicable circumstances.

- Case plan goal (foster care element #43)

The frequency report indicates there are 2,746 (33%) of the records with a case plan goal “not yet established.” This seemed to be a high number of records with no case plan goal. This was supported by the case file analysis. There were several errors where the AFCARS report indicated “not yet established” and the child was in foster care for more than 60 days, some for more than a year. This may be partially due to where the program code extracts the information. The State and Federal teams agreed that the screen being used is not the most appropriate one. The State agreed to review the work flow for the entry of this information and make corrections accordingly. Also, the State is considering adding an alert to remind workers close to 60 days after the child enters foster care that a case plan goal must be established.

Another issue identified in the case file review indicates that workers may not be updating the case plan goal in a timely manner. There were records where the case plan goal should have been “long-term foster care” not “guardianship” or “reunify.”

- Has the agency determined special needs and the primary basis for special needs (adoption element #9 and 10)

There was a significant discrepancy in the frequency report between the response of “yes” for this element and the response of “yes” for adoption element #35, which deals with whether an adoption subsidy exists. The numbers for element #35 were much higher than those in elements nine and ten. There is a default mapping missing data to “no.” The default needs to be removed and the State needs to ensure that workers enter the information regarding the primary basis for special needs.

- Relationship of child to adoptive parents (adoption elements #29 – 32)

In the adoption file, the State is to report the relationship of the child to the adoptive parent(s). AFCARS allows for the reporting of more than one relationship. The State collects this data but it may be underreported in regard to multiple relationships. The system allows the worker to select only one relationship (step-parent, foster parent, other relative or other non-relative) of the adoptive parent to the child. For instance, if the adoptive parent was a relative and had been a foster parent, only one of the relationships is reported in AFCARS. This is

resulting in an under-representation of the number of relatives and foster parents that are adopting children in Iowa.

- Child was placed by [agency or person] (adoption element #34)

AFCARS asks for who or what agency placed the child for adoption - the public agency, a private agency, a tribal agency, an independent person, or the birth parent. The State is incorrectly reporting this information. The program code only extracts the response “public agency.” This is incorrect because the State also is involved in non-State agency adoptions. The State enters into adoption agreements with families adopting children from private agencies where the child was determined to have special needs. These records should indicate “placed by private agency” in the AFCARS report.

CONCLUSION

The State has several “technical” corrections to make to the program code and the screens that collect the data. Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. The State and the ACF Regional Office (in conjunction with the Children’s Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates of its progress to the Regional Office. Additionally, the State’s plan for implementing the changes to the system and for caseworker training must be included in the State’s title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The State should contact the ACF Regional Office once it has completed the changes to the system. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.